

February 21, 2013

Via Electronic Filing

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Ex Parte Presentation, Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10

Dear Ms. Dortch:

On February 19, 2013, Christopher Guttman-McCabe and Brian Josef of CTIA—The Wireless Association®, spoke via telephone with Travis Litman, Ken Lynch, Chelsea Fallon, Ellen Burton and Rodger Woock of the Wireline Competition Bureau, and Susan Singer, Michael Jansen, Mitali Shah, and Eliot Maenner of the Wireless Telecommunications Bureau (collectively, "FCC Staff"), regarding issues relevant to the above-listed proceeding. The conversation was a follow-up to previous discussions regarding potential changes to the current FCC Form 477 broadband data collection and the Commission's goal of updating and improving the data collected from wireless providers, while minimizing burdens on those entities filing Form 477.

During the discussion, FCC Staff noted their interest in transitioning the current collection of deployment data from the CTIA broadband mapping program into mandatory Form 477 reporting accompanied by provider certifications. FCC Staff explained their desire to obtain shape file maps from providers, submitted by air interface technology, frequency band, and advertised speeds. FCC Staff also expressed their interest in providers reporting adoption information at the county level by shape file, including (1) prepaid and postpaid subscribers, (2) classification of device type (*e.g.*, smartphone, tablet, etc.), and (3) subscribers that bundle wireline and wireless services where providers offer both. Finally, FCC Staff explained that they are seeking information about the feasibility of reporting machine-to-machine adoption data, including e-readers and other devices, in a revised Form 477.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef



cc: Travis Litman
Ken Lynch
Chelsea Fallon
Ellen Burton
Rodger Woock
Susan Singer
Michael Jansen
Mitali Shah
Eliot Maenner